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Attorneys for Defendant,  
*Albertson's LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ANJALI SAROOP, individually	)	Case No.	2:20-CV-00627-KJD-BNW
	)		
Plaintiff,	)		
	)		
vs.	)	<b>DEFENDANTS' ADMISSION TO LIABILITY</b>	
	)	<b>REGARDING DUTY AND BREACH ONLY</b>	
ALBERTSON'S, LLC, a Foreign Limited-	)		
Liability Company; DOES I through XX; and	)		
ROE CORPORATIONS I through XX,	)		
inclusive,	)		
	)		
Defendants.	)		

Pursuant to Fed. R. Civ. P. Rule 16(c)(2)(C), Defendant ALBERTSON'S LLC, by and through its counsel of record Jack P. Burden, Esq. and Jacquelyn Franco, Esq. of the law firm BACKUS, CARRANZA & BURDEN, and Plaintiff ANJALI SAROOP, by and through her counsel of record Glenn A. Paternoster, Esq. and Pooja Kumar, Esq. of the law firm PATERNOSTER LAW GROUP, hereby stipulate as follows:

1. Albertsons hereby admits liability as to duty and breach only, in regard to the subject incident. Specifically, Albertsons admits that it had a duty to maintain its premises in a reasonably safe condition and warn patrons of potential unsafe conditions and Albertsons breached this duty.

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2. Albertsons admits it had a duty to inspect its premises and take reasonable precautions to protect Plaintiff from dangerous conditions unknown to Plaintiff and breached this duty to Plaintiff with regard to the unsecured floral department sign and allowed the floral department sign to fall on to Plaintiff's personhood.

3. Albertsons makes no admission that any of Plaintiff's claimed injuries were caused by the floral department sign falling.

5. Both parties may utilize all relevant medical records and expert testimony pertaining to causation and damages.

DATED: \_\_November 29, 2021\_\_\_\_\_  
**BACKUS, CARRANZA & BURDEN**

DATED: \_\_November 29, 2021\_\_\_\_\_  
**PATERNOSTER LAW GROUP**

/s/ Jacquelyn Franco  
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 Jacquelyn Franco, Esq.  
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/s/ Glenn Paternoster  
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 Las Vegas, NV 89101  
*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED.

DATED: 12/1/2021

  
 \_\_\_\_\_  
**U.S. DISTRICT COURT JUDGE**  
**KENT J. DAWSON**

Respectfully Submitted By:  
**BACKUS, CARRANZA & BURDEN**

By: /s/ Jacquelyn Franco  
 Jack P. Burden, Esq.  
 Jacquelyn Franco, Esq.  
*Attorneys for Defendant*